

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA**

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Lauren Nicole Knecht,  
Plaintiff,

v.

Equifax Information Services, LLC,  
Defendant.

Court File No. \_\_\_\_\_

**NOTICE OF REMOVAL**

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Defendant Equifax Information Services LLC (“Equifax”) files this notice of removal of this action to the United States District Court for the District of North Dakota and provides the following grounds for removal:

1. This Court has original jurisdiction under 28 U.S.C. § 1331 and this action may be removed pursuant to 28 U.S.C. § 1441(a) in that at the time of the commencement of this action and filing of this notice, Plaintiff alleges damages as a result of Defendant’s violation of 15 U.S.C § 1681, et. seq.

2. Equifax first received a copy of the Summons and Complaint on or after February 5, 2024. Thirty days after such receipt has not yet expired.

3. Attached as **Exhibit A** to this Notice is a copy of all summons, pleadings, and orders received by Equifax to date.

4. The judicial district of this Court embraces Cass County, North Dakota, the place where this action is pending.

5. Equifax will provide written notice to Plaintiff and file a Notice of Removal with the Clerk of the District Court of Cass County, North Dakota. A copy of the Notice of Filing is attached as **Exhibit B**.

WHEREFORE, the action now pending against Equifax in the District Court of Cass County, North Dakota, is removed to the United States District Court for the District of North Dakota pursuant to 28 U.S.C. §§ 1331, 1332 and 1441.

**MESSERLI & KRAMER P.A.**

Dated: February 26, 2024

By: s/ Terrance J. Wagener.

Terrance J. Wagener  
100 S. Fifth Street, Suite 1400  
Minneapolis, MN 55402-1217  
Phone: (612) 672-3600  
twagener@messerlikramer.com

ATTORNEYS FOR DEFENDANT